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July 1, 2008

The Honorable Charles Terreni Chief Clerk of the Commission Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

> AT&T South Carolina's Petition Requesting the Commission's Re: Intervention in NANPA NXX Code Assignments Docket No.

Dear Mr. Terreni:

BellSouth Telecommunications Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully encloses for filing a Petition for Review of NXX Code Denial in the Chapin/Little Mountain-South Rate Center in the above-captioned matter.

By copy of this letter, I am serving a copy of this document on NANPA, NeuStar, and the ORS, as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml Attachment 714993

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

In Re:	AT&T SOUTH CAROLINA'S)	
	PETITION REQUESTING THE COMMISSION'S) DOCKET NO	
	INTERVENTION IN NANPA NXX CODE		
	ASSIGNMENTS)	

PETITION FOR REVIEW OF NXX CODE DENIAL IN THE CHAPIN/LITTLE MOUNTAIN-SOUTH RATE CENTER

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina ("AT&T South Carolina"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging determinations of the North American Numbering Plan Administration ("NANPA"), petitions the Public Service Commission of South Carolina ("Commission") for review of NANPA's denial of AT&T South Carolina's application for use of central office code numbering resources in the 803 area code. The denial that is the subject of this Petition impacts AT&T South Carolina customer, School District 5 of Lexington and Richland Counties.

In support of this Petition, AT&T South Carolina states:

- 1. AT&T South Carolina is a telephone utility that provides certain services that are regulated by the Commission. Among other things, it provides intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Chapin/Little Mountain-South exchange.
- 2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan ("NANP"). See 47 C.F.R. § 52.13 (a), (b).

- 3. On March 31, 2000, the FCC issued a Report and Order and Further Notice of Proposed Rule Making relating to numbering resource optimization ("FCC 00-104"). The goal of FCC 00-104 was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers under the NANP.
- 4. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two subsequent orders. FCC 00-429 at ¶ 29 (rel. Dec. 29, 2000); FCC 01-362 at ¶¶ 48-49 (rel. Dec. 28, 2001). Prior to this ruling, the Central Office Code Assignment Guidelines, used by the industry and NANPA to make code assignments, required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.
- 5. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center. FCC 00-429 at Paragraph 22; FCC 01-362, ¶¶ 50-52. The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources. *Id*.

- 6. On or about May 23, 2008, AT&T South Carolina submitted a Pooling Administration System request to NANPA and NeuStar for the assignment of the two thousand-number blocks (5000 6999) an existing (803) NXX in the Chapin/Little Mountain-South exchange to go with its customer's existing dialing plan in the Chapin/Little Mountain-South exchange. The requested numbers are needed to meet the numbering demands of the customer at four existing schools and at three new schools. As AT&T South Carolina does not have the existing numbers to meet the customer's request, it is requesting that the numbers be assigned to it. Exhibit A to this Petition is a copy of the customer's letter.
- 7. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee's (INC's) and/or NANPA's guidelines, and AT&T South Carolina filled out the necessary Month-to-Exhaust Certification Worksheets as required.
- 8. At the time of the filing of the Code request, the Chapin/Little Mountain-South Rate Center had a MTE of 10.77 months and an utilization of 49.31 %. See Exhibit B.
- 9. Thereafter, also on May 23, 2008, NANPA's Central Office Code Administration denied AT&T South Carolina's request because AT&T South Carolina had not met the rate center based MTE criterion now set forth in the Central Office Code (NXX) Guidelines. NANPA denied AT&T South Carolina's code requests despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Chapin/Little Mountain-South Rate Center. NANPA's response is also included as part of Exhibit B.
- 10. AT&T South Carolina's inability to provide this important customer with the requested numbers prevents AT&T South Carolina from providing the quality of service this

customer desires, needs, and expects. If AT&T South Carolina is not assigned the NXX number blocks needed to meet the customer's request, AT&T South Carolina will be unable to provide telecommunications services requested by its customer. NANPA's refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources," FCC 00-429 at ¶ 61.

- 11. Both the FCC's rules and the Central Office Code (NXX) Assignment Guidelines provide that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. See FCC 01-362, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); FCC 01-362 at ¶¶ 61-66; Central Office Code (NXX) Assignment Guidelines § 13.0 ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").
- 12. Prior to the FCC's Order and the resulting change in the Central Office Code (NXX) Assignment Guidelines, the MTE procedures used by NANPA permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, NANPA looks at the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may

grant relief "if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory." FCC 01-362, ¶ 64. In addition, the FCC has ruled that, "States...may grant requests for customers seeking contiguous block of numbers." *Id*.

- 13. AT&T South Carolina requests that the Commission reverse NANPA's decision to withhold numbering resources from AT&T South Carolina because that decision interferes with AT&T South Carolina's ability to provide telecommunication services to its customers as required under South Carolina law.
- 14. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review NANPA denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

WHEREFORE, AT&T South Carolina requests that the Commission:

- 1. Reverse the decision of NANPA to deny AT&T South Carolina's request for additional numbering resources;
- 2. Direct NANPA to provide the two thousand-number blocks in the existing (803)

 NXX in the Chapin/Little Mountain-South exchange or provide a new (803) NXX in the Chapin/Little Mountain-South exchange to go with the customer's existing dialing plan in the Chapin/Little Mountain-South Rate Center; and

3. Grant the requested relief as soon as possible.

Respectfully submitted this Large day of July, 2008.

Patrick W. Turner

Suite 5200

1600 Williams Street

Columbia, South Carolina 29201

(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

713406

Exhibit A



April 9, 2008

Hugh R. Kyzer 1600 Williams St Suite 3600 Columbia, SC 29201

Dear Hugh R. Kyzer:

District Five of Lexington & Richland Counties is expanding rapidly. We are in the middle of a VOIP project with AT&T that will place a phone in every classroom of our four current Chapin attendance area schools. This fall we will be going for a bond referendum to build three new schools in the Chapin attendance area. Depending on the size of the schools, each school will have between 100 and 300 phones. Each phone will have a direct dial number to facilitate contact between parents, teachers, staff, and the community.

We are requesting 2000 numbers served out of the 803-345 Central Office ranging from 5000 to 6969. Central Office CLLI = CHAPSCCLRS2.

In facilitating communication between our District Office and Chapin attendance area schools, we request that this range of numbers be marked local to Columbia, SC. This would eliminate any long distance charges or long distance dialing difficulties for residents and District Five.

Thank you for your assistance with this project.

Thank you.

Zachary S. Huffines

Information Systems Network Manager

Jachary S. Wiffines

District Five of Lexington & Richland Counties

Exhibit B

	Time: 05/28/	2008 03:00:36 PM EDT	•	
		2000 00.00.00 7 111 201		Prir
dividual Block	November 21, 2003			Attachment
equests	ATIS-0300066.at3			
New Block	Pooling	Administrator's Re	esponse/Confirmat	ion
Request New Block	_	TBPAG Pa		
Reservation				
Assign/Cancel		803-		
Reservation	Tracking Number:	CHPNLTLMTS-		
Block		SC-214139	_	
Modification				
Block Disconnect	Date of Application:	05/23/2008	Effective Date:	
Saved Block	Date of Receipt:	05/23/2008	Date of Response:	05/23/2008
Requests Modify Pending	·		- '	
Request	Service Provider Name:	BELLSOUTH SO	BELL	
D/NXX Code	(Telcordia TM LERG TM	· · · · · · · · · · · · · · · · · · ·		
equests	Routing Guide) OCN:	9417		
New Code	3 ,			
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Code Modification		T- Make A		
Code Disconnect	Dealing Administrator C			
the state of the s	Pooling Administrator C Dora Wirth			005 202 0700
nfirm Resources Service		Phone:		925-363-8706
nate Blocks	Signature of Pooling Adm			005 000 7004
bmit Forecast	Dora Wirth	Fax:		925-363-7684
	Name (print)			
arch Forms	Email:	dora.w	virth@neustar.com	1
ports				
ports er Profile				
·	NPA-NXX or NPA-		Block Assigned	!•
· 1	NPA-NXX or NPA- NXX-X :		Block Assigned	
·			Block Reserved	:
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· 1			Block Reserved Block Reservati Expiration Date:	:
· 1	NXX-X :	Yes or No):	Block Reserved Block Reservati Expiration Date: Block/Code Mod	:
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· 1	Block Contaminated(If Yes,enter the number of Switch Identification(S	per of TNs contaminated	Block Reserved Block Reservati Expiration Date: Block/Code Mod Block/Code Disconnected:	dified:
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1	Block Contaminated(If Yes,enter the numble Switch Identification(S) Rate Center: Rate Center Sub Zone X Form Complete, req	per of TNs contaminated Switch Entity/POI): ¹ e:	Block Reserved Block Reservati Expiration Date: Block/Code Mod Block/Code Disconnected:	dified:
1	Block Contaminated(If Yes,enter the numble Switch Identification(S) Rate Center: Rate Center Sub Zone X Form Complete, req Explanation:	per of TNs contaminated Switch Entity/POI): ¹ e:	Block Reserved Block Reservati Expiration Date: Block/Code Mod Block/Code Disconnected: CHAPSCCLE CHPNLTLMT	dified:

Page 2 c
Request withdrawn
Explanation
Assignment activity suspended by the administrator
3-xplanation
Remarks.
Tins is an eleven-character descriptor provided by the owning entity for the purpose of
corting calls. This must be the CLLI TM Location Identification code of the switching entity/Pipi shown on the Part IA form (Tekordia LERG ROUTING Guide and CLL) are reademarks of Tekordia Technologies Inc.)
Back .

Pooling Administration System aida.armesto@att.com (SP) Sign Out Time: 05/28/2008 03:00:57 PM EDT لق Printable Version - Mindividual Block Appendix 3 August 6, 2001 Requests MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹ New Block (Thousands-Block Number Pooling Growth Block Request) Request ∄New Block Reservation Assign/Cancel Tracking Number: 803-CHPNLTLMTS-SC-214139 Reservation Date: 05/23/2008 OCN:9417 Company Name: BELLSOUTH SO BELL ∄Block Modification Rate Center: CHPNLTLMTS Block Disconnect Saved Block List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s): Requests Modify Pending Request 内JCO/NXX Code Name of Block Applicant: Aida Armesto Signature: Aida Armesto Requests New Code Title: Associate Tech Support Analyst Network Telephone No.: 305-260-8205 Request FAX No.: 305-264-2918 ີ່ Code Modification E-mail: aida.armesto@att.com Code Disconnect + ந்ப்Confirm Resources In Service A. Available Numbers: 3827 + 🖺 Donate Blocks + 🖺 Submit Forecast B. Assigned Numbers: 3896 + 🗓 Search Forms + 🗓 Reports C. Total Numbering Resources:7901 + DUser Profile D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation:0 Excluded Code(s) or Block(s): Month #1 #2 #3 #5 #6 #7 #8 #10 #11 #12 E. Growth History -21 23 8 21 35 24 Previous 6 months² F. Forecast - Next 12 2022 22 22 22 22 22 22 22 22 months³ C. reversige Monthly Europasa (Sum of months 1.6 (Part Flabove) divided by 6):355:333 H. Months Numbers Available for Assignment to Customers(A) Exhaust⁴

Average Monthly Forecast(G) **Block Requested** Months To Exhaust Available Numbers 1 3827 10.77 Utilization⁵ Assigned Numbers(B) - Excluded Numbers(D) X 100 = 49.31 Total Numbering Resources(C)-Excluded Numbers(D) Explanation: ¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document. ²Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month. ³Forecast of TNs needed in each following month, starting with the most recent month as Month #1. ⁴To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)). ⁵Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))Back Question? Email us 1997-2012 NeuStar, Inc. Legal Notice

	Pooling	Administra	tion Sy	stem	
aida.armesto@att.com (SP)		-			Sign Out
_	Time	: 05/28/2008 03:01:4	1 PM EDT		
ந்] - ந்]Individual Block Requests ிNew Block				TBPAG Attachment 1 - March 19,	Printable Version 2007
Request New Block Reservation		Thousands-Bloc	k Applicatio	on Form - Part 1A	
Assign/Cancel Reservation Block	Tracking Number:	803- CHPNLTLMTS- SC-214139			
Modification ☐Block Disconnect ☐Saved Block		Individual Block Request			
Requests Modify Pending Request	Type of Application:	New	Change i	Disconnect	
- js_CO/NXX Code Requests j New Code Request		GENERAL AP	PLICATION !	INFORMATION	
Code Modification	te 1.1 Contact information:				
Code Disconnect	Block Applicant: Company Name	BELLSOUTH SO	BELL		
In Service Headquarters Address 2600 Camino Ramon					
+ Donate Blocks	City, State, Zip: San Ramon, CA, 94583				
+ 🖺 Submit Forecast + 🖺 Search Forms	Contact Name:	Aida Armesto			
+ 🗓 Search Forms + 🗓 Reports	Contact Address:	600 NW 79 Ave			
+ 🖼 User Profile	City,State,Zip:	Miami , FL , 33182	<u>}</u>		
	Phone: 305- 260-8205	FAX: 305-264- 2918	E-mail: aid	a.armesto@att.com	
	Pooling Adminis				
	Contact Name:	Dora Wirth			
	Contact Address:	1800 Sutter St			
	City,State,Zip:	Concord ,CA,9452	20		
	Phone:	925-363-8706	FAX: 925 -	363-7684	
	E-mail: dora.wi	rth@neustar.com			
1.2 General Information:					
	Check one : No	LRN needed X	LRN neede	ed ^{III}	
	NPA: 803	LATA: 434	OCN: iv 9417	Parent Company's OCN 9400	
	Number of Thou	sands-Blocks Reques	ted: 2		
	Switching Identii CHAPSCCL	fication(Switch Entity/F RS2	^v : (IO ^v		
	City or Wire Cer	iter Name :		Rate Center: vi CHPNLTLMTS	
	Rate Center Sul	Zone:			

1.3 Dates:

Date of Application: vii 05/23/2008 Requested Block Effective Date: viii 06/23/2008

Request Expedited Treatment? (See Section 8.6) Yes No X

1.4 Type of Service Provider Requesting the Thousands-Block:

- a) Type of Service Provider: Incumbent Local Exchange Carrier (ILEC) (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : Wireline
- c) Thousands Blockis) (NXX-X) assignment Preference (Optional) DUE TO DIALING RESTRICTIONS CUSTOMER IS REQUESTING BLOCKS 5000-6999
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool)

1.5 Type of Request:

Initial block for rate center: Yes If Yes, attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center: Yes X If Yes, attach months to exhaust worksheet

Type of change(Mark all that apply)

OCN:Intra-company ix Switching Id Part 1B

OCN:Inter-company x Effective Date

Change block: Yes If Yes , list NPA-NXX-X

1.6 Block Return :

- a) Is this block Contaminated Yes No
- b) If Yes how many TNs are NOT available for assignment:
- c) Have all new Intra SP ports been completed in the NPAC Yes No
- d) Has this block been protected from further assignment Yes No

Disconnect block : Yes If Yes , list NPA-NXX-X

Remarks

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (http://www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Associate
Tech
Aida Armesto
Support 05/23/2008
Analyst
Network

Signature of Block Applicant Title Date

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and email.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the TelcordiaTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia TM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider xi. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes:

- ildentify the type of change(s) in Section 1.5.
- ii The Pool Administrator is available to assist in completing these forms.
- iii A CO Code application will also need to be submitted to the PA.
- iv Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- V This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.
- vi Rate Center name must be a tariffed Rate Center.
- vii Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- viii Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ix Select if you are the current Block Holder.
- X Select if you are not the current Block Holder
- xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Pooling Administration System		Page 4 of 4
	Back	

	Pooling Administration System
aida.armesto@att.com (SP	• Sign Out
	Time : 05/23/2008 09:27:25 AM EDT
Individual Block Requests New Block Reservation Assign/Cancel Reservation Block Modification Block Disconnect Saved Block Requests Modify Pending Request CO/NXX Code Request Code Modification Code Disconnect Code Disconnect Submit Forecast Donate Blocks Dearch Forms Dearch Forms Dearch Forms Dearch Forms	Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹ Your Utilization calculates to 49.310%. The FCC required the utilization of 75.000%. You have requested more blocks than you will exhaust in six months. Select One Option and Submit Recurred to request a State Waiver Received a State Waiver Submit Cancel Cancel
	1997 2012 NeuStar Inc. Legal Notice

STATE OF SOUTH CAROLINA)	
)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)	

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina ("AT&T") and that she has caused AT&T's Petition for Review of NXX Code Denial in the Chapin/Little Mountain-South Rate Center to be served by the method indicated below upon the following this July 1, 2008:

Thomas C. Foley
Sr. NPA Relief Planner – Eastern Region NANPA
NeuStar – NANPA
820 Riverbend Blvd.
Longwood, FL 32779-2327
(U. S. Mail)

Ms. Kimberly Miller Regulatory Policy Attorney NeuStar-NANPA 2000 M Street, NW, Suite 600 Washington, DC 20036-3328 (U. S. Mail)

Wayne Milby Sr. NPA Relief Planner NueStar-NANPA 8385 Yahley Mill Rd. Richmond, VA 23231 (U. S. Mail)

F. David Butler, Esquire General Counsel S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail) Jocelyn G. Boyd, Esquire Staff Attorney S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) jocelyn.boyd@psc.sc.gov (Electronic Mail)

Joseph Melchers Chief Counsel S.C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail)

Florence P. Belser, Esquire Office of Regulatory Staff 1441 Main Street, Suite 300 Columbia, SC 29201 (Electronic Mail)

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